

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WI-LAN INC.,)	
)	
Plaintiff,)	
)	
v.)	10 Civ. 432 (LAK) (AJP)
)	
LG ELECTRONICS, INC. and LG)	
ELECTRONICS U.S.A., INC.,)	
)	
Defendants.)	
)	

PLAINTIFF WI-LAN INC.’S NOTICE OF MOTION FOR SANCTIONS

PLEASE TAKE NOTICE that, upon the annexed Declaration of Matthew C. Holohan, together with supporting exhibits annexed thereto, the annexed Declaration of Michael A. Dolan, the annexed Memorandum of Points and Authorities, and upon all pleadings and proceedings previously had herein, the undersigned, counsel for Plaintiff Wi-LAN Inc. (“Plaintiff”), will move this Court, located in Room 12D of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order granting the following sanctions against Defendants LG Electronics, Inc. (“LGE”) and LG Electronics U.S.A., Inc. (“LGEUS”) (collectively “Defendants”):

1. Compelling Defendants to reimburse Plaintiff for the following costs:
 - a. All fees and costs associated with the source code review sessions conducted on September 9-10, September 24, and October 1-2, 2010;
 - b. All fees and costs associated with the depositions of Defendants’ witnesses conducted in Seoul on October 6-7, 2010, and in Chicago on November 30;

- c. All fees and costs associated with seeking to address Defendants' deficient source code production, including the drafting of letters and Court conferences; and
 - d. All fees and costs associated with preparing this motion.
2. Instructing the jury that Defendants intentionally withheld, concealed, and obfuscated evidence that demonstrates the infringing operation of Defendants' Accused Products as described in further detail in the accompanying Memorandum of Points and Authorities.

Dated: April 1, 2010

KILPATRICK TOWNSEND & STOCKTON LLP

/s/ Matthew C. Holohan

David E. Sipiora

Matthew C. Holohan (admitted *pro hac vice*)

1400 Wewatta Street, Suite 600

Denver, CO 80202

Telephone: (303) 571-4000

Facsimile: (303) 571-4321

David A. Koenigsberg

MENZ BONNER & KOMAR LLP

444 Madison Ave., 39th Floor

New York, New York 10022

(212) 223-2100

Attorneys for Plaintiff

Wi-LAN Inc.

62950826 v1